

EXHIBIT 13

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

Case No. 17-cv-00939-WHA

-----x

WAYMO LLC,

Plaintiff,

- against -

UBER TECHNOLOGIES, INC.; OTTOMOTTO, LLC;

OTTO TRUCKING LLC,

Defendants.

-----x

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

Videotaped 30(b)(6) Deposition

of GARY BROWN, taken by Defendants, held

at the offices of Morrison & Foerster LLP,
250 West 55th Street, at 9:59 a.m. on August
8, 2017, New York, New York, before Jineen
Pavesi, a Registered Professional Reporter,
Registered Merit Reporter, Certified Realtime
Reporter and Notary Public of the State of New York.

Job No. 2671217A

Pages 1 - 305

1 documents, correct? 10:05:16AM

2 A. Yes. 10:05:21AM

3 Q. And you have personal knowledge 10:05:21AM

4 of that investigation, correct? 10:05:22AM

5 A. Yes. 10:05:25AM

6 Q. Is there any aspect of what you 10:05:27AM

7 know personally that Waymo -- that is not 10:05:29AM

8 knowledge of Waymo's? 10:05:40AM

9 MR. BAKER: Objection to form. 10:05:45AM

10 MS. GOODMAN: You have made 10:05:49AM

11 your record; the witness is allowed to 10:05:49AM

12 answer the question. 10:05:51AM

13 MR. BAKER: I am allowed to ask 10:05:52AM

14 questions, this doesn't have anything to 10:05:53AM

15 do with an objection, all right, I 10:05:54AM

16 understand what the rules are on the 10:05:56AM

17 objections. 10:05:58AM

18 My understanding is that Judge 10:05:58AM

19 Alsup wants a separate transcript for the 10:06:04AM

20 30(b)(6) portion and for the portion in 10:06:05AM

21 his personal capacity; my understanding is 10:06:09AM

22 that right now this is the 30(b)(6), is 10:06:11AM

23 that correct? 10:06:13AM

24 MS. GOODMAN: That is correct, 10:06:14AM

25 I'm trying to establish whether the 10:06:15AM

C E R T I F I C A T I O N

I, Jineen Pavesi, a Registered Professional Reporter, Registered Merit Reporter, Certified Realtime Reporter and a Notary Public, do hereby certify that the foregoing witness, GARY BROWN, was duly sworn on the date indicated, and that the foregoing is a true and accurate transcription of my stenographic notes.

I further certify that I am not employed by nor related to any party to this action.

A handwritten signature in black ink that reads "Jineen Pavesi, RPR, RMR". The signature is written in a cursive, flowing style.

JINEEN PAVESI, RPR, RMR, CRR